REMARKS

Applicants have carefully reviewed the Office Action dated November 22, 2003. Applicants have amended Claims 5 and 18 to more clearly point out the present inventive concept. Reconsideration and favorable action is respectfully requested.

Upon a careful reading of the present *Office Action* as well as the previous *Office Actions* and the Applicants' replies and amendments thereto, Applicants respectfully submit that the structure and operation of Applicants' invention as recited in the amended Claim 5 continues to be misunderstood and offer the following clarifications.

Applicants' invention recited in Claim 5 has a single RIP in the input portion of the job distributor as contrasted with the *Barry* reference which has multiple RIP engines, one in each print engine module, wherein raster image processing occurs *after* distribution of the image print data to each individual print engine module. This important and fundamental structural difference between the present application and the *Barry* reference has several consequences which are apparently not appreciated in the present and foregoing *Office Actions*.

First, it is the *single* RIP engine in the input portion of the job distributor of Claim 5 of the present application which *receives* multiple page documents, *generates* rasterized page data and *provides* the rasterized data organized for parallel distribution to the inputs of selected ones of the plurality of print engines according to print job parameters associated with the rasterized data. Please refer to Figures 1, 2 and 12 in the accompanying Detailed Description on pages 8-9 and 25 of the Specification.

In contrast, in the *Barry* print system of multiple print engines, wherein each print engine has its own raster image processor, the RIP takes place *after* the distribution of image print data to the selected print engines. See, e.g., Figures 1 and 5 of *Barry*. Thus, the decoding of the print data to obtain any print job parameters embedded in the print data occurs *after* distribution and is thus not available for use in the operation of the image distributor. Therefore, *Barry* is not capable of "distribution [of rasterized page data] to said inputs of selected ones of said plurality of physical print engine modules *according*

to print job parameters associated with said rasterized data." Emphasis added. In other words, this portion of the function of the job distributor set forth in Claim 5 of Applicants' invention cannot be performed by *Barry* because it lacks the structure [in fact, it teaches a different structure] to provide this function.

Second, it is asserted in the "Response to Arguments" on page 6 of the Detailed Action that "[s]ince each page has different [sic] content (which reads on print parameters), the image distributor determines this (the content) and routes the page to a different print engine (Col. 3, lines 35-44)," quoting from *Barry* except for the parenthetical notes. Applicants contend that different content does not read on print parameters because content differences among pages are not print or print job parameters (such as color, black and white, BIT resolution, BIT depth, etc. as noted on pages 25 and 27 of Applicants' Specification). Moreover, the "this" referred-to in line 43 of Col. 3 of *Barry* refers to processing time for the page (see lines 39-42 of Col. 3 of *Barry*) and not to the content itself.

However, neither the processing time nor the content of the page are print parameters that would be recovered from rasterized page data, which, as is shown hereinabove, is not available to the image distributor of *Barry*

To summarize, Applicants' believe that Claim 5 cannot be successfully read upon or anticipated by *Barry* because this reference lacks the structure necessary to practice the invention as recited in the claim.

Matias is offered by the Examiner as being sufficient to supply the disclosure that is missing in *Barry* and to supply the motivation to combine *Matias* with *Barry*. While *Matias* in Figure 3 in Col. 6, lines 51-67, discloses a front end device and a multiplexer or LAN networking device, which respectively have RIP and distribution capabilities and which supply print jobs to multiple marking engines, there is no teaching or suggestion in *Matias* that the queueing or inputting of print jobs to the marking engines by the multiplexer or LAN in this embodiment has anything to do with print job parameters. Such teaching, to provide the required motivation to combine *Matias* with *Barry*, is

necessary if *Barry* is to be modified such that the combination anticipates all that is recited in Applicants' Claim 5.
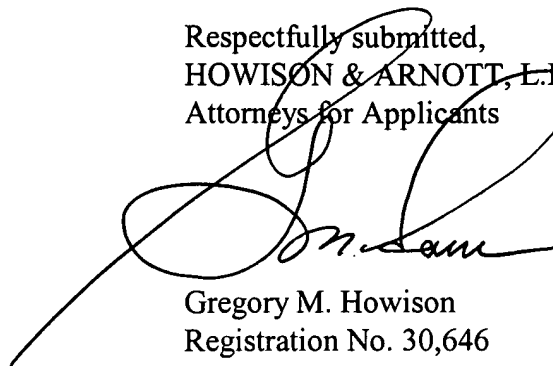
To summarize, Applicants contend that Claim 5 is not anticipated or rendered obvious by the combination of *Barry* and *Matias* because *Barry* lacks the structure necessary to practice the invention as recited in the claim (particularly almost all of the last step of Claim 5), and because there is insufficient teaching or motivation provided by the *Matias* reference such that the combination fully anticipates or renders obvious all that is recited in Claim 5 as amended.

Regarding Claim 18, which like Claim 5 is supported by the description accompanying Figures 1, 2 and 12 in the Applicants' Specification, the foregoing arguments are also applicable. Further with respect to Claim 18, addressed in the *Office Action* on page 3, the "image task manager" and an "engine manager" - two elements of Claim 18 - both require the input of print data that has already been rasterized (see Applicants' Figure 2), a requirement that is *not* disclosed in *Barry* because in *Barry* rasterizing occurs in each print engine module *after* the processing described in *Barry*, Figure 3 at Col. 6, line 50 to Col. 7, line 3.

For the foregoing reasons Applicants respectfully submit that independent Claims 5 and 18 as amended are not anticipated or rendered obvious by the *Barry* and *Matias* references, either alone or in combination. A pplicants t herefore r espectfully r equest t he w ithdrawal o f this r ejection. F urther, Applicants respectfully submit that since each of the dependent Claims 6-17 and 19-27 depend ultimately or directly from the respective base Claims 5 and 18, and therefore contain all of the limitations i n t he r espective b ase c laims, t hat t hese d ependent claims a re l ikewise b elieved t o b e allowable over the prior art of record and the Applicants respectfully request the withdrawal of the rejections as to these dependent claims as well.

Applicants h ave n ow m ade a n e arnest a ttempt i n o rder t o p lace t his c ase i n c ondition f or allowance. For the reasons stated above, Applicants respectfully request full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/TRSY-23,677 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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